



Louis Leon <lleon@cafaroest.com>

---

## RE: Chinca v. Patel

1 message

**Jason Mizrahi** <Jason@levinestein.com>  
To: Louis Leon <lleon@cafaroest.com>  
Cc: Joshua Levin-Epstein <Joshua@levinestein.com>

Wed, Jul 8, 2020 at 3:46 PM

That's it. Please let me know if you consent to the extension.

---

Jason Mizrahi, Esq.

Levin-Epstein & Associates, P.C.

[420 Lexington Ave., Suite 2525](#)

[New York, NY 10170](#)

Phone: (212) 792-0048

Mobile: (301) 758-7351

Facsimile: (646) 786-3170

Email: [Jason@levinestein.com](mailto:Jason@levinestein.com)

*The information contained in this transmission, including attachments, is strictly confidential and intended solely for and the use by the intended recipients. This email may be protected by the attorney-client privilege, work-product doctrine, or other applicable legal or professional protections. If you are not the intended recipient, please be notified that any retention, use, disclosure, dissemination, distribution or copying of this email is strictly prohibited, kindly notify us of your inadvertent receipt of the email, by return email, destroy any printouts and delete any electronic copies. Any waiver of any privilege which might otherwise arise from this email being sent to, or received by, an unintended recipient is hereby expressly disclaimed. No attorney-client relationship is created by virtue of a recipients receipt of this email in error. Thank you.*

---

**From:** Louis Leon <lleon@cafaroest.com>  
**Sent:** Wednesday, July 8, 2020 3:40 PM  
**To:** Jason Mizrahi <Jason@levinestein.com>  
**Cc:** Joshua Levin-Epstein <Joshua@levinestein.com>  
**Subject:** Re: Chinca v. Patel

Jason:

Are there any other reasons you'd like to disclose? I think it is grossly misleading for you not to mention that from the

beginning.

**Sincerely,**  
**Louis M. Leon, Esq.**  
**Associate**

Description: Doc1

108 West 39<sup>th</sup> Street, Suite 602  
New York, NY 10018  
Main (212) 583-7400  
Fax. (212) 583-7401  
[LLeon@CafaroEsq.com](mailto:LLeon@CafaroEsq.com)

On Wed, Jul 8, 2020 at 3:38 PM Jason Mizrahi <[Jason@levinestein.com](mailto:Jason@levinestein.com)> wrote:

Louis,

An additional reason is that we are waiting on a time-stamped copy of the deposition transcript.

The Court Reporting agency has just advised us that the only file of the time-stamped transcript is located on a laptop that has been confiscated by the TSA. They expect the laptop to arrive back in their possession by close-of-business on Friday (7/10).

Please let me know if you are willing to consent to a short extension to, through and including, Wednesday (7/15).

Jason

---

Jason Mizrahi, Esq.  
Levin-Epstein & Associates, P.C.  
<420 Lexington Ave., Suite 2525>  
New York, NY 10170  
Phone: (212) 792-0048  
Mobile: (301) 758-7351  
Facsimile: (646) 786-3170  
Email: [Jason@levinestein.com](mailto:Jason@levinestein.com)

The information contained in this transmission, including attachments, is strictly confidential and intended solely for and the use by the intended recipients. This email may be protected by the attorney-client privilege, work-product doctrine, or other applicable legal or professional protections. If you are not the intended recipient, please be notified that any retention, use, disclosure, dissemination, distribution or copying of this email is strictly prohibited, kindly notify us of your inadvertent receipt of the email, by return email, destroy any printouts and delete any electronic copies. Any waiver of any privilege which might otherwise arise from this email being sent to, or received

by, an unintended recipient is hereby expressly disclaimed. No attorney-client relationship is created by virtue of a recipients receipt of this email in error. Thank you.

-----Original Message-----

From: Jason Mizrahi  
Sent: Wednesday, July 8, 2020 2:33 PM  
To: Louis Leon <[lleon@cafaroest.com](mailto:lleon@cafaroest.com)>  
Cc: Joshua Levin-Epstein <[Joshua@levinestein.com](mailto:Joshua@levinestein.com)>  
Subject: RE: Chinca v. Patel

Our office has two conflicting back-to-back mediations coming up.

We are also operating on a short week due to the long holiday weekend.

Jason

---

Jason Mizrahi, Esq.  
Levin-Epstein & Associates, P.C.  
[420 Lexington Ave., Suite 2525](#)  
New York, NY 10170  
Phone: (212) 792-0048  
Mobile: (301) 758-7351  
Facsimile: (646) 786-3170  
Email: [Jason@levinestein.com](mailto:Jason@levinestein.com)

The information contained in this transmission, including attachments, is strictly confidential and intended solely for and the use by the intended recipients. This email may be protected by the attorney-client privilege, work-product doctrine, or other applicable legal or professional protections. If you are not the intended recipient, please be notified that any retention, use, disclosure, dissemination, distribution or copying of this email is strictly prohibited, kindly notify us of your inadvertent receipt of the email, by return email, destroy any printouts and delete any electronic copies. Any waiver of any privilege which might otherwise arise from this email being sent to, or received by, an unintended recipient is hereby expressly disclaimed. No attorney-client relationship is created by virtue of a recipients receipt of this email in error. Thank you.

-----Original Message-----

From: Louis Leon <[lleon@cafaroest.com](mailto:lleon@cafaroest.com)>  
Sent: Wednesday, July 8, 2020 2:24 PM  
To: Jason Mizrahi <[Jason@levinestein.com](mailto:Jason@levinestein.com)>  
Cc: Joshua Levin-Epstein <[Joshua@levinestein.com](mailto:Joshua@levinestein.com)>  
Subject: Re: Chinca v. Patel

Why do you need the extension of time?

Sincerely,  
Louis M. Leon  
Sent from my iPhone

> On Jul 8, 2020, at 2:08 PM, Jason Mizrahi <[Jason@levinestein.com](mailto:Jason@levinestein.com)> wrote:  
>  
> Louis,  
>  
> To clarify, we're seeking an extension to Wednesday (7/15).  
>  
>  
> Jason Mizrahi, Esq.  
> Levin-Epstein & Associates, P.C.

> 420 Lexington Ave., Suite 2525

> New York, NY 10170

> Phone: (212) 792-0048

> Mobile: (301) 758-7351

> Facsimile: (646) 786-3170

> Email: [Jason@levinestein.com](mailto:Jason@levinestein.com)

>

> The information contained in this transmission, including attachments, is strictly confidential and intended solely for and the use by the intended recipients. This email may be protected by the attorney-client privilege, work-product doctrine, or other applicable legal or professional protections. If you are not the intended recipient, please be notified that any retention, use, disclosure, dissemination, distribution or copying of this email is strictly prohibited, kindly notify us of your inadvertent receipt of the email, by return email, destroy any printouts and delete any electronic copies. Any waiver of any privilege which might otherwise arise from this email being sent to, or received by, an unintended recipient is hereby expressly disclaimed. No attorney-client relationship is created by virtue of a recipients receipt of this email in error. Thank you.

>

> -----Original Message-----

> From: Jason Mizrahi

> Sent: Wednesday, July 8, 2020 2:05 PM

> To: Louis Leon <[lleon@cafaroest.com](mailto:lleon@cafaroest.com)>

> Cc: Joshua Levin-Epstein <[Joshua@levinestein.com](mailto:Joshua@levinestein.com)>

> Subject: RE: Chinca v. Patel

>

> Hi Louis,

>

> I just tried your line but couldn't reach you.

>

> Can you please return my call? We'd like to request an extension of the July 10, 2020 Opposition Filing Deadline.

>

> Do you consent? Please let me know so I can inform the Court.

>

> Jason

>

>

> Jason Mizrahi, Esq.

> Levin-Epstein & Associates, P.C.

> 420 Lexington Ave., Suite 2525

> New York, NY 10170

> Phone: (212) 792-0048

> Mobile: (301) 758-7351

> Facsimile: (646) 786-3170

> Email: [Jason@levinestein.com](mailto:Jason@levinestein.com)

>

> The information contained in this transmission, including attachments, is strictly confidential and intended solely for and the use by the intended recipients. This email may be protected by the attorney-client privilege, work-product doctrine, or other applicable legal or professional protections. If you are not the intended recipient, please be notified that any retention, use, disclosure, dissemination, distribution or copying of this email is strictly prohibited, kindly notify us of your inadvertent receipt of the email, by return email, destroy any printouts and delete any electronic copies. Any waiver of any privilege which might otherwise arise from this email being sent to, or received by, an unintended recipient is hereby expressly disclaimed. No attorney-client relationship is created by virtue of a recipients receipt of this email in error. Thank you.

>

> -----Original Message-----

> From: Jason Mizrahi

> Sent: Thursday, June 25, 2020 10:15 AM

> To: Louis Leon <[lleon@cafaroest.com](mailto:lleon@cafaroest.com)>

> Cc: Joshua Levin-Epstein <[Joshua@levinestein.com](mailto:Joshua@levinestein.com)>

> Subject: RE: Chinca v. Patel  
>  
> Louis,  
>  
> Good morning. July 10th is fine.  
>  
> We consent.  
>  
> Jason  
>  
> -----Original Message-----  
> From: Louis Leon <[lleon@cafaroest.com](mailto:lleon@cafaroest.com)>  
> Sent: Wednesday, June 24, 2020 8:01 PM  
> To: Jason Mizrahi <[Jason@levinestein.com](mailto:Jason@levinestein.com)>  
> Cc: Joshua Levin-Epstein <[Joshua@levinestein.com](mailto:Joshua@levinestein.com)>  
> Subject: Re: Chinca v. Patel  
>  
> Jason:  
>  
> That doesn't really sound plausible. If we are asking for the motion deadline to be extended by five days, the opposition deadline should also be extended by five days only. That brings us to July 7. If you want, we would agree to extend the opposition deadline to July 10, but I don't think the judge will appreciate more than that. Please let me know ASAP.  
>  
> Sincerely,  
> Louis M. Leon  
> Sent from my iPhone  
>  
>> On Jun 24, 2020, at 6:15 PM, Jason Mizrahi <[Jason@levinestein.com](mailto:Jason@levinestein.com)> wrote:  
>>  
>> Louis,  
>>  
>> We are amenable to an extension of time to file the motions to 6/30, with oppositions being due on 7/21, in light of the 4th of July holiday.  
>>  
>> Jason  
>>  
>>> On Jun 24, 2020, at 4:46 PM, Louis Leon <[lleon@cafaroest.com](mailto:lleon@cafaroest.com)> wrote:  
>>>